

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

P.M., a Minor, By and Through Her Parent,	:	
TERPSEHORE MARAS,	:	CASE NO. 1:21 CV 1711
Plaintiffs,	:	JUDGE SOLOMON OLIVER, JR.
vs.	:	
MAYFIELD CITY SCHOOL DISTRICT BOARD	:	<b>MOTION TO DISMISS AMENDED</b>
OF EDUCATION, et al.	:	<b>COMPLAINT</b>
Defendants.	:	

Pursuant to Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6), Defendants the Mayfield City School District Board of Education (the “Board”), its Superintendent Dr. Michael J. Barnes (the “Superintendent”), and its members Ron Fornaro, Sue Grozek, Al Hess, George Hughes, and Jimmy Teresi (collectively, “Defendants”) move to dismiss the Amended Complaint filed by Plaintiff Terpsehore Maras (“Plaintiff”).

As explained more fully in the Memorandum in Support, Plaintiff lacks standing and, thus, the Court lacks subject matter jurisdiction because (1) Plaintiff may not bring an action *pro se* on her daughter’s behalf; (2) Plaintiff does not identify any actual or threatened injury to herself personally and, thus, lacks standing to pursue claims in her own name; and (3) Plaintiff’s Amended Complaint fails to establish any plausible constitutional violation giving rise to the right to relief.

Therefore, Defendants request that the Court to dismiss the Amended Complaint in full, with prejudice.

Respectfully Submitted,

/s/ Thomas L. Feher

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**LOCAL RULE 7.1(f) CERTIFICATION**

This case has not yet been assigned to any track. The attached Memorandum adheres to the page limitation set forth in Local Rule 7.1 for unassigned cases.

*/s/ Thomas L. Feher*  
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*One of the Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of October, 2021, a copy of the foregoing **Motion to Dismiss the Amended Complaint** was filed electronically with the United States District Court for the Northern District of Ohio. Notice was sent to Plaintiff at [mayfieldparentsunion@gmail.com](mailto:mayfieldparentsunion@gmail.com).

*/s/ Thomas L. Feher*  
*One of the Attorneys for Defendants*